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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF NEWARK; CITY OF JERSEY CITY;  
CITY OF PATERSON; CITY OF HOBOKEN;  
NEWARK CITY COUNCIL; JERSEY CITY CITY  
COUNCIL; PATTERSON CITY COUNCIL;  
HOBOKEN CITY COUNCIL; C. LAWRENCE  
CRUMP, Newark City Council President, in his  
official capacity; JOYCE E. WATERMAN,  
Jersey City City Council President, in her official  
capacity; ALEX MENDEZ, Paterson City Council  
President, in his official capacity; JAMES DOYLE,  
in his official capacity; RAS J. BARAKA, Mayor  
of Newark, in his official capacity; STEVEN M.  
FULOP, Mayer of Jersey City, in his official  
capacity; ANDRÉ SAYEGH, Mayor of Paterson,  
in his official capacity; RAVINDER S. BHALLA,  
Mayor of Hoboken, in his official capacity,

Defendants.

Civil Action No. 25-cv-5081

**NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE***

PLEASE TAKE NOTICE that, on July 14, 2025 or as soon as the Court deems appropriate,  
the City of Newark; Newark City Council; C. Lawrence Crump, Newark City Council President,  
in his official capacity; Ras J. Baraka, Mayor of Newark, in his official capacity; the City of  
Hoboken; Hoboken City Council; James Doyle, Hoboken City Council President, in his official  
capacity; and Ravinder S. Bhalla, Mayor of Hoboken, in his official capacity, by and through their

undersigned attorney, will move before this Court for an order admitting Colleen Roh Sinzdak, of the law firm MILBANK LLP, *pro hac vice* in this action.

In support of the motion, the movants rely upon the accompanying Declaration of Colleen Roh Sinzdak and the accompanying Certificate of Good Standing with the court of the District of Columbia. The movants respectfully submit that no brief is necessary in connection with this motion, inasmuch as the bases of this application are set forth in the accompanying Declaration and Certificate of Good Standing. A proposed Order is also submitted.

Dated: July 14, 2025

Respectfully submitted,

By /s/ Gurbir S. Grewal

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